BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012   Docket No. N2012-1

PUBLIC REPRESENTATIVE'S THIRD SET OF
INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
(PR/USPS-T-3: 28)

(March 8, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatory. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

This interrogatory is propounded for the purpose of developing intervenor testimony. The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

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Docket No. N2012-1

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PR/USPS-T-3-28

The general topic of this question is the Microsoft Scoring Tool provided in the Library Reference USPS-LR-N2012-1/14, file "14_Mail Processing Window Scoring Tool.xls." The aim of this question is to replicate the Postal Service witness's results using this tool.

Please refer to your response to GCA/USPS-T3-36 where you state: "The six point scale is binary. If any one factor failed the scenario was considered infeasible."

Please also refer to your response to GCA/USPS-T3-1 (c) where you state:

> In addition, to replicate the exact results you need to ensure that all assumptions are identical. You can use the tool two ways: perform one-off assumption changes or have it run through multiple iterations. The 6,371.56 is a result of an earlier run where the iteration function was used. The 6,872.70 is based on the assumptions currently saved in the model. That value resides in cell N46, on the calculations tab, prior to making any adjustments. Thus, they do not match because you are not comparing the 'like' scenarios.

a.   Please confirm that the "like" scenarios, as referenced in the above-referenced answer, mean scenarios based on identical assumptions. If not confirmed, please provide the definition for "like" scenarios.

b.   Please provide an example (specifically identifying the data or cell to manipulate and other steps) of using the tool to:

  i.   perform a "one-off assumption change" to generate results.

  ii.   "run through multiple iterations" to generate results.

c.   When generating the results in the scoring tool, using all the assumptions exactly as saved in the model provided in the Library Reference USPS-LR-N2012-1/14 (file "14_Mail Processing Window Scoring Tool.xls") there appears to be a feasibility issue. The annual cost savings shown in worksheet 'Results', cell 'R5' are equal to 6,872.7, which is consistent with your answer quoted above. However, after generating the results, one of the six binary scales ('Last Outgoing Trip Arrives before Incoming CET') changed from 'True' to 'False' (worksheet 'Calculations', cell 'E51'). The overall feasibility also changed to 'False' (worksheet 'Calculations, cell 'C49').

Please confirm that the scenario currently saved in the model and presented in the file "14_Mail Processing Window Scoring Tool.xls" is infeasible. If confirmed, please explain the assumption or value that causes such infeasibility. Also, please provide a version with saved assumptions that generates a feasible scenario resulting in 6,872.70 total savings.

i.   If not confirmed, please explain why the scenario, using the assumptions saved in the model, generates an infeasible result. *See* Library Reference USPS-LR-N2012-1/14 (worksheet 'Assumptions', file "14_Mail Processing Window Scoring Tool.xls").

ii.   If not confirmed, please explain in detail the steps in the process needed to replicate the feasible results using the scoring tool with assumptions as saved in the file submitted in USPS-LR-N2012-1/14.